

Appendix IS-6

Utility Report



**SUNSET LAS PALMAS LOWER LOT PLAN
(6650 ROMAINE STREET, LOS ANGELES CA 90038)**

UTILITY INFRASTRUCTURE TECHNICAL REPORT: WATER AND WASTEWATER

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1. INTRODUCTION

1.1. PROJECT LOCATION AND EXISTING ON-SITE USES:

The Site consists of approximately 3.08 acres that encompass a City block bound by Romaine Street to the north, Seward Street to the east, Barton Avenue to the south, and North Las Palmas Avenue to the west. The Site is located at 6650 W. Romaine Street and 6619 Barton Avenue (APN 5532-014-039).

The Site is developed and occupied by three single-story buildings, one two-story building, and a surface and structured parking. It also includes a trash compactor, two storage containers, and a paint shop.

1.2. PROJECT DESCRIPTION

The Lower Lot, bounded by Romaine Street to the north and N. Las Palmas Avenue to the west, has a site area of 133,989 square feet and is currently developed with 25,367 square feet of floor area and an existing parking structure. As part of the Project, approximately 25,367 square feet of existing floor area used for creative office and support areas will be demolished, and the following buildings constructed:

- Production Support/Mill Building: facing Romaine Street and N. Las Palmas Avenue.
 - Stories: 4-story above grade
 - Not a High Rise; top floor is below 75' from lowest level of fire department access.
 - Floor Area (net):
 - 69,883 square feet of lobby, shower facilities, and restrooms on the ground floor. Production support uses on levels one through four.
 - Height: 63'-0" Per LAMC 12.21.1
- Four Sound Stages: facing Barton Avenue and N. Las Palmas Avenue.
 - Stories: 1-story above grade
 - Not a High Rise; top floor is below 75' from lowest level of fire department access.
 - Floor Area (net):
 - Each contains approximately 15,000 square feet.
 - Height: 55'-0" Per LAMC 12.21.1

1.3. SCOPE OF WORK

The purpose of this report is to analyze the potential impact of the Project to the existing water and wastewater system.

2. REGULATORY FRAMEWORK

2.1. WATER

There are several plans, policies, and programs regarding water supply and infrastructure at the state, regional, and local levels that apply to the Project. Described below, these include:

- California Urban Water Management Plan Act
- Senate Bill 610, Senate Bill 221 and Senate Bill 7
- Senate Bill X7-7 (Water Conservation Act of 2009)
- Sustainable Groundwater Management Act of 2014
- California Code of Regulations
 - Title 20
 - CALGreen Code
 - Plumbing Code
- Executive Order B-40-17
- Executive Order N-10-21
- Metropolitan Water District
 - 2020 Urban Water Management Plan
 - 2015 Integrated Resources Plan
 - Water Surplus and Drought Management Plan
 - Long-Term Conservation Plan
 - Water Supply Allocation Plan
- Los Angeles Department of Water and Power's 2020 Urban Water Management Plan
- Green New Deal
- One Water LA 2040 Plan
- City of Los Angeles General Plan, including:
 - Framework Element
 - Community Plan
- Los Angeles Municipal Code (Ordinance Nos. 180,822, 181,480, 181,899, 183,833, 182,849, 184,692, and 184,248)

a) State

(1) California Urban Water Management Plan Act

The California Urban Water Management Planning Act (Water Code, Section 10610, et seq.) addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires Urban Water Suppliers to develop Urban Water Management Plans (UWMPs) every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Urban Water Suppliers are defined as water

suppliers that either serve more than 3,000 customers or provide more than 3,000 acre feet per year (afy) of water to customers.

(2) Senate Bill 610, Senate Bill 221 and Senate Bill 7

Two of the state laws addressing the assessment of water supply necessary to serve large-scale development projects, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610, codified in Water Code Sections 10910-10915, specifies the requirements for water supply assessments (WSAs) and their role in the California Environmental Quality Act (CEQA) process and defines the role UWMPs play in the WSA process. SB 610 requires that, for projects subject to CEQA that meet specific size criteria, the water supplier prepare WSAs that determine whether the water supplier has sufficient water resources to serve the projected water demands associated with the projects. SB 610 provides specific guidance regarding how future supplies are to be calculated in the WSAs, where an applicable UWMP has been prepared. Specifically, a WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. In addition, the WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610, projects for which a WSA must be prepared are those subject to CEQA that meet any of the following criteria:

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
- Mixed-use projects that include one or more of the projects specified above; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling-unit project. (Water Code Section 912, CEQA Guidelines Section 15155(a)).

The WSA must be approved by the public water supplier serving the project at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater

management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past 5 years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

SB 221 also addresses water supply in the land use approval process for large residential subdivision projects. However, unlike SB 610 WSAs, which are prepared at the beginning of a planning process, SB 221-required Water Supply Verification (WSV) is prepared at the end of the planning process for such projects. Under SB 221, a water supplier must prepare and adopt a WSV, indicating sufficient water supply is available to serve a proposed subdivision, or the local agency must make a specific finding that sufficient water supplies are or will be available prior to completion of a project, as part of the conditions for the approval of a final subdivision map. SB 221 specifically applies to residential subdivisions of 500 units or more. However, Government Code Section 66473.7(i) exempts “...any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses; or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses; or housing projects that are exclusively for very low and low-income households.”

SB 7, enacted on November 10, 2009, mandates new water conservation goals for UWMPs, requiring Urban Water Suppliers to achieve a 20-percent-per-capita water consumption reduction by the year 2020 statewide, as described in the “20 x 2020” State Water Conservation Plan.¹ As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, which requirements in turn must be taken into consideration in preparing and adopting WSAs under SB 610.

(3) Senate Bill X7-7 – Water Conservation Act

SB X7-7 (Water Conservation Act of 2009), codified in California Water Code Section 10608, requires all water suppliers to increase water use efficiency. Enacted in 2009, this legislation sets an overall goal of reducing per capita urban water use, compared to 2009 use, by 20 percent by December 31, 2020. The State of California was required to make incremental progress towards this goal by reducing per capita water use by at least 10 percent on or before December 31, 2015. Monthly statewide potable water savings reached 25.1 percent in February 2017 as compared to that in February 2013.² Cumulative statewide savings from June 2015 through February 2017 were estimated at 22.5 percent.³ Following a multi-year drought and improvements to hydrologic conditions, statewide potable water savings reached 14.7 percent in August 2017 as compared to August 2013 potable water production.⁴ As provided in LADWP’s 2020 UWMP, in accordance with SB X7-7, LADWP developed a final reported

¹ State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010.

² State Water Resources Control Board, Fact Sheet, February 2017 Statewide Conservation Data, updated April 4, 2017.

³ State Water Resources Control Board, Media Release, “Statewide Water Savings Exceed 25 Percent in February; Conservation to Remain a California Way of Life,” April 4, 2017.

⁴ State Water Resources Control Board, Fact Sheet, August 2017 Statewide Conservation Data, updated October 3, 2017.

2020 target of 142 gallons per capita per day. LADWP's actual gallons per capita per day in 2020 was 106 gallons per capita per day, less than the 2020 target.⁵

(4) Sustainable Groundwater Management Act of 2014⁶

The Sustainable Groundwater Management Act (SGMA) of 2014, passed in September 2014, is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities.⁷ The SGMA requires the formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local groundwater sustainability agencies were required to be formed by June 30, 2017. The SGMA provides 20 years for groundwater sustainability agencies to implement plans, achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local groundwater sustainability agencies with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, SGMA requires governments and water agencies of high and medium priority basins to stop overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. For the basins that are critically over-drafted, the timeline is 2040. For the remaining high and medium priority basins, the deadline is 2042.

(5) California Code of Regulations

(a) *Title 20*

Title 20, Sections 1605.3 (h) and 1505(i) of the California Code of Regulations (CCR) establishes applicable State efficiency standards (i.e., maximum flow rates) for plumbing fittings and fixtures, including fixtures, such as showerheads, lavatory faucets, and water closets (toilets). Among the standards, the maximum flow rate for showerheads manufactured on or after July 1, 2018 is 1.8 gallons per minute (gpm) at 80 pounds per square inch (psi) and for lavatory faucets manufactured after July 1, 2016 is 1.2 gpm at 60 psi. The standard for toilets sold or offered for sale on or after January 1, 2016 is 1.28 gallons per flush.⁸

⁵ City of Los Angeles, Los Angeles Department of Water and Power. 2020 Urban Water Management Plan for the Los Angeles Department of Water & Power, page 1-8.

⁶ Sustainable Groundwater Management Act [And Related Statutory Provisions from SB1168 (Pavley), AB1739 (Dickinson), and SB1319 (Pavley) as Chaptered], 2015 Amendments, effective January 1, 2016.

⁷ California Department of Water Resources. SGMA Groundwater Management. <https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>.

⁸ California Code of Regulations, Title 20, Sections 1605.3(h) and 1605.3(j), <https://energycodeace.com/site/custom/public/reference-ace-t20/index.html#!Documents/section16053statestandardsfornonfederallyregulatedappliances.htm>. Accessed March 26, 2024.

(b) CALGreen Code

Part 11 of Title 24, the title that regulates the design and construction of buildings, establishes the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code includes both mandatory measures as well as voluntary measures. The mandatory measures establish minimum baselines that must be met in order for a building to be approved. The mandatory measures for water conservation provide limits for fixture flow rates, which are the same as those for the Title 20 efficiency standards listed above. The voluntary measures can be adopted by local jurisdictions for greater efficiency.

(c) Plumbing Code

Title 24, Part 5 of the CCR establishes the California Plumbing Code. The California Plumbing Code sets forth efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The 2022 California Plumbing Code, which is based on the 2021 Uniform Plumbing Code, has been published by the California Building Standards Commission and went into effect on January 1, 2023.

(6) Executive Order B-40-17

On April 7, 2017, Executive Order B-40-17 was issued to formally end the drought emergency and lifted the drought emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne. In response to Executive Order B-40-17, on April 26, 2017, the State Water Resources Control Board (SWRCB) partially repealed the emergency regulation in regard to water supply stress test requirements and remaining mandatory conservation standards for urban water suppliers. The order also rescinded two drought-related emergency proclamations and four drought-related executive orders. Cities and water districts throughout the State are required to continue reporting their water use each month. Executive Order B-40-17 continued the ban on wasteful practices, including hosing off sidewalks and running sprinklers when it rains

(7) Executive Order N-10-21

On July 8, 2021 Executive Order N-10-21 was issued calling for voluntary cutbacks of water usage by 15% from 2020 usage levels. The Executive Order N-10-21 lists commonsense measures Californians can undertake to achieve water usage reduction goals and identifies the SWRCB for tracking of monthly reporting on the State's progress. The Order also directs State agencies, led by the Department of Water Resources and in coordination with local agencies, to encourage actions by all Californians, in their residential, industrial, commercial, agricultural, or institutional use, to reduce water usage, including through the statewide Save Our Water conservation campaign. Thirdly, the Order directs the Department

of Water Resources to monitor hydrologic conditions such as cumulative precipitation, reservoir storage levels, soil moisture and other metrics, and the Water Board to monitor progress on voluntary conservation as ongoing indicators of water supply risk that may inform future drought response actions.

b) Regional

(1) Metropolitan Water District

As discussed in detail below, the Metropolitan Water District of Southern California (MWD) is a primary source of water supply within Southern California. Based on the water supply planning requirements imposed on its member agencies and ultimate customers, MWD has adopted a series of official reports on the state of its water supplies. As described in further detail below, in response to recent developments in the Sacramento Delta, the MWD has developed plans intended to provide solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, including the City of Los Angeles.

(a) 2020 Urban Water Management Plan

MWD's 2020 UWMP (MWD UWMP) addresses the future of MWD's water supplies and demand through the year 2045.⁹ Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions (i.e., under the most challenging weather conditions, such as drought and service interruptions caused by natural disasters) is presented in Table 2-5 of the 2020 MWD UWMP.¹⁰ The analysis in the MWD UWMP concluded that reliable water resources would be available to continuously meet demand through 2045.¹¹ In the MWD UWMP, the projected 2045 demand water during multiple-dry year conditions is 1,564,000 afy, whereas the expected and projected 2045 supply is 2,239,000 afy based on current programs, for a potential surplus in 2045 of 675,000 afy.¹²

MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. MWD has also developed an Emergency Storage Requirement to mitigate against potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region and is working with the State to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region. MWD is also working with the State on the Delta Risk Management Strategy to reduce the impacts of a seismic event in the Delta that would cause levee failure and disruption of State Water Project (SWP) deliveries. In addition, MWD has plans for supply implementation and continued development of a diversified resource mix, including programs in the

⁹ Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, June 2021,

¹⁰ Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, page 2-19.

¹¹ Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, page 2-19,

¹² Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, page 2-19.

Colorado River Aqueduct, SWP, Central Valley transfers, local resource projects, and in-region storage that enables the region to meet its water supply needs.

(b) 2015 Integrated Resources Plan

MWD prepares an Integrated Water Resources Plan (IRP) that provides a water management framework with plans and programs for meeting future water needs. It addresses issues that can affect future water supply, such as water quality, climate change, and regulatory and operational changes. The most current IRP (2015 IRP) was adopted in January 2016.¹³ It establishes a water supply reliability mission of providing its service area with an adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way. Among other topics, the 2015 IRP discusses water conservation, local and imported water supplies, storage and transfers, water demand, and adaptation to drought conditions.

The 2015 IRP reliability targets identify developments in imported and local water supply and in water conservation that, if successful, would provide a future without water shortages and mandatory restrictions under planned conditions. For imported supplies, MWD would make investments to maximize Colorado River Aqueduct deliveries in dry years. MWD would make ecologically-sound infrastructure investments to the SWP so that the water system can capture sufficient supplies to help meet average year demands and to refill the MWD storage network in above-average and wet years.

Planned actions to keep supplies and demands in balance include, among others, lowering regional residential per capita demand by 20 percent by the year 2020 (compared to a baseline established in 2009 state legislation), reducing water use from outdoor landscapes and advancing additional local supplies. IRP Table ES-1, 2015 IRP Update Total Level of Average-Year Supply Targeted (Acre-Feet), of the 2015 IRP, shows the supply reliability and conservation targets. As presented in the IRP, the total supply reliability target for each five-year increase between 2016 and 2040 would exceed the retail demand after conservation. In 2040, retail demand after conservation is estimated to be 4,273,000 af and the total supply reliability target is approximately 4,539,000 af, representing an excess of 266,000 af.¹⁴

The 2020 IRP planning process is currently in development.¹⁵ The 2020 IRP analyzes multiple scenarios that could plausibly unfold in the future due to climate change, economic growth, legislation and regulations affecting water sources and demands, and other variables. With the variability of these impacts in mind, MWD is developing four scenarios to help understand the challenges of the future and effectively plan to ensure water reliability in the face of those challenges. These four scenarios include

¹³ Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2015 Update, Report No. 1518, January 2016.

¹⁴ Metropolitan Water District of Southern California, Integrated Water Resources Plan – 2015 Update, Report 1518. page VIII.

¹⁵ Metropolitan Water District of Southern California, Integrated Water Resources Plan, 2020.

(A) low demand, stable imports; (B) high demand, stable imports; (C) low demand, reduced imports; and (D) high demand, reduced imports.^{16 17}

(c) Water Surplus and Drought Management Plan

In 1999, MWD incorporated the water storage contingency analysis that is required as part of any UWMP into a separate, more detailed plan, called the Water Surplus and Drought Management Plan (WSDM Plan). The overall objective of the WSDM Plan is to ensure that shortage allocation of MWD's imported water supplies is not required. The WSDM Plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's IRP. The WSDM Plan separates resource actions into two major categories: Surplus Actions and Shortage Actions. The WSDM Plan considers the region to be in surplus only after MWD has met all demands for water, including replenishment deliveries. The Surplus Actions store surplus water, first inside then outside of the region. The Shortage Actions of the WSDM are separated into three subcategories: Shortage, Severe Shortage, and Extreme Shortage. Each category has associated actions that could be taken as part of the response to prevailing shortage conditions. Conservation and water efficiency programs are part of MWD's resource management strategy through all categories.¹⁸

(d) Long-Term Conservation Plan

The Long-Term Conservation Plan (LTCP) provides a framework of goals and strategies to reduce per capita water use through conservation and water use efficiency. The plan recognizes the challenges and uncertainties to achieving the IRP target. As a result, the LTCP uses adaptive management and strategies to adjust implementation approaches.

(e) Water Supply Allocation Plan

While the WSDM Plan included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a detailed water supply allocation plan or implementation approach. Therefore, in February 2008, MWD adopted a water supply plan called the Water Supply Allocation Plan (WSAP). The WSAP includes a formula for determining equitable, needs-based reductions of water deliveries, with the potential application of a surcharge, to member agencies during extreme water shortages in MWD's service area conditions (i.e., drought conditions or unforeseen interruptions in water supplies).

¹⁶ Metropolitan Water District of Southern California, Preliminary Gap Analysis of the 2020 Integrated Resources Plan, December 15, 2020. Low demand = slow economic growth; stable imports = gradual climate change and low regulatory impacts; high demand = high economic growth; and reduced imports = severe climate impacts and high regulatory impacts.

¹⁷ Preliminary Gap Analysis of the 2020 Integrated Resources Plan, <https://www.mwdh2o.com/media/17999/12152020-irp-6b-presentation.pdf>.

¹⁸ Water Surplus and Drought Management Plan, Report No. 1150, August 1999.

The WSAP allows member agencies the flexibility to choose among various local supply and conservation strategies to help ensure that demands on MWD stay in balance with limited supplies. The WSAP formula addresses shortages of MWD supplies, by taking into account growth, local investments, changes in supply conditions and the demand hardening aspects of non-potable recycled water use and the implementation of conservation savings programs.¹⁹ The allocation period covers 12 consecutive months from July of a given year through the following June.

c) Local

(1) Los Angeles Department of Water and Power's 2020 Urban Water Management Plan (UWMP)

In accordance with the California Urban Water Management Planning Act, UWMPs are updated at 5-year intervals. LADWP adopted the 2020 UWMP on May 25, 2021. The 2020 UWMP complies with the Urban Water Management Planning Act, builds upon the goals and progress made in the 2015 UWMP, and currently serves as the City's master plan for reliable water supply and resource management consistent with the City goals and objectives. The UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's UWMP used a service area-wide methodology in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the projected growth in water use for the entire service area was considered in developing long-term water projections for the City to the year 2050. Long range projections are based on Southern California Association of Government (SCAG) growth projections. The 2020 UWMP is based on projections in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

(2) Green New Deal

On April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAn, which includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.²⁰ The Sustainable City pLAn was intended to be updated every four years.

In April 2019, Mayor Eric Garcetti released an update to the Sustainable City pLAn, which has been renamed as L.A.'s Green New Deal, which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.²¹ The Green New Deal augments, expands, and elaborates in more detail the City's vision for a sustainable future and includes a multi-faceted approach to developing a locally sustainable water supply to reduce reliance on imported water, reducing water use through conservation, and increasing local water supply and availability.

¹⁹ Metropolitan Water District of Southern California, 2020 Urban Water Management Plan, June 2021.

²⁰ City of Los Angeles, Sustainable City pLAn, April 2015.

²¹ City of Los Angeles, L.A.'s Green New Deal, 2019.

(3) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA 2040 Plan (One Water LA Plan), an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.²² The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.²³ Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

(4) City of Los Angeles General Plan

(a) General Plan Framework Element

The General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan.²⁴ The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for City utilities, including water service. Goal 9C is to provide adequate water supply, storage facilities, and delivery system to serve the needs of existing and future water needs.²⁵ The goals, objectives, and policies are addressed by the City in its ordinances and preparation of its UWMP.

The following General Plan goals, objectives, and policies relate to water supply:

TABLE 1 - APPLICABLE GENERAL PLAN UTILITIES AND SERVICE SYSTEMS GOALS, OBJECTIVES, AND POLICIES: FRAMEWORK ELEMENT—CHAPTER 9, INFRASTRUCTURE AND PUBLIC SERVICES

Goal/Objective/Policy	Goal/Objective/Policy Description
Goal 9C	Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses.
Objective 9.1	Monitor and forecast demand based upon actual and predicted growth.
Objective 9.8	Monitor and forecast water demand based upon actual and predicted growth.
Policy 9.8.1	Monitor water usage and population and job forecast to project future water needs.

²² City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

²³ City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response - Creating a Water Wise City, October 14, 2014.

²⁴ City of Los Angeles Department of City Planning, Citywide General Plan Framework, An Element of the Los Angeles General Plan, July 27, 1995.

²⁵ City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services – Water Supply.

Objective 9.9	Manage and expand the City's water resources, storage facilities, and water lines to accommodate projected population increases and new or expanded industries and businesses.
Policy 9.9.1	Pursue all economically efficient water conservation measures at the local and statewide level.
Policy 9.9.7	Incorporate water conservation practices in the design of new projects so as not to impede the City's ability to supply water to its other users or overdraft its groundwater basins.
Objective 9.10	Ensure that water supply, storage, and delivery systems are adequate to support planned development.
Policy 9.10.1	Evaluate the water system's capability to meet water demand resulting from the Framework Element's land use patterns.
Policy 9.10.2	Solicit public involvement, when appropriate, in evaluating options for the construction of new and/or expansion of existing water facilities.
Objective 9.11	Ensure, to the maximum extent possible, the continued provision of water capacity, quality and delivery after an earthquake or other emergency.
Policy 9.11.1	Provide for the prompt resumption of water service with adequate quantity and quality of water after an emergency.
SOURCE: City of Los Angeles, <i>City of Los Angeles General Plan, Framework Element</i> , re-adopted 2001.	

(b) Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to utilities and service systems required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The Hollywood Community Plan does not include objectives or policies related to water supply and infrastructure.

(5) Los Angeles Municipal Code

The City has adopted several ordinances, later codified in the Los Angeles Municipal Code (LAMC), in an effort to reduce water consumption. A summary of the City's key regulations regarding water conservation is provided below.

- Ordinance No. 180,822—amended LAMC Chapter XII, Article 5 to establish water efficiency requirements for new development and renovation of existing buildings, and mandate installation of high efficiency plumbing fixtures in residential and commercial buildings.
- Ordinance No. 181,480—amended LAMC Chapter IX by adding Article 9 (Green Building Code) to the LAMC to incorporate various provisions of the CALGreen Code. This ordinance added mandatory measures for newly constructed low-rise residential and non-residential buildings to reduce indoor water use by at least 20

percent by (1) using water saving fixtures or flow restrictions and/or (2) demonstrating a 20-percent reduction in baseline water use.

- Ordinance Nos. 181,899 and 183,833—amended LAMC Chapter VI, Article 4.4, Section 64.72, regarding stormwater and urban runoff to include new requirements, including Low Impact Development (LID) requirements that promote water conservation.

- Ordinance No. 182,849—amended LAMC Chapter IX, Article 9 (Green Building Code) to mandate that for new water service or for additions or alterations requiring upgraded water service for landscaped areas of at least 1,000 square feet, separate sub-meters or metering devices shall be installed for outdoor potable water use. This ordinance also required that for new non-residential construction with at least 1,000 square feet of cumulative landscaped area, weather or soil moisture-based irrigation controllers and sensors be installed.

- Ordinance No. 184,692—amended LAMC Chapter IX, Article 4 (Plumbing Code) by adopting by reference various sections of the California Plumbing Code. This ordinance also added requirements for plumbing fixtures and fixture fitting.

- Ordinance No. 184,248—amended LAMC Chapter IX, Article 4 (Plumbing Code) and Article 9 (Green Building Code) to establish Citywide water efficiency standards and mandate a number of new fixture requirements and methods of construction for plumbing and irrigation systems.

The City of Los Angeles also has adopted numerous requirements related to the provision of water for purposes of fire protection. These requirements are set forth in the Fire Code (LAMC Chapter V, Article 7). LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the Los Angeles Fire Department (LAFD), vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gpm in low density residential areas to 12,000 gpm in high density commercial or industrial areas. A minimum residual water pressure of 20 psi is to remain in the water system with the required gpm flowing. LAMC Section 57.507.3.2 also addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

2.2. WASTEWATER

There are several plans, policies, and programs regarding Wastewater at the state and local levels that apply to the Project. Described below, these include:

- California Green Building Standards Code
- City of Los Angeles General Plan Framework Element
- Los Angeles Integrated Resources Plan
- One Water LA 2040 Plan
- Los Angeles Municipal Code
 - Los Angeles Green Building Code (Ordinance No. 181,480)
 - Water Efficiency Requirements Ordinance (Ordinance No. 180,822)
 - Sewer Capacity Availability Review (SCAR; LAMC Section 64.15)
 - Sewerage Facilities Charge (LAMC Sections 64.11.2 and 64.16.1)
 - Bureau of Engineering Special Order No. SO 06-0691

a) State

(1) California Green Building Standards Code

The CALGreen Code is set forth in CCR Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all flush toilets are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallon per flush. In addition, maximum flow rates for faucets are established at 2.0 gpm at 80 pounds psi for showerheads, 1.2 gpm at 60 psi for residential lavatory faucets, and 1.8 gpm at 60 psi for kitchen faucets.

b) Local

(1) City of Los Angeles General Plan Framework

The Framework Element establishes the conceptual basis for the City's General Plan.²⁶ The Framework Element sets forth a comprehensive Citywide long-range growth strategy and defines Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element identifies goals, objectives, and policies for utilities in the City, including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.²⁷

(2) Los Angeles Integrated Resources Plan

The City's IRP was developed by multiple departments in order to address the facility needs of the City's wastewater program, recycled water, and urban runoff/stormwater management through the year 2020.

²⁶ City of Los Angeles, Ordinance No. 181480.

²⁷ City of Los Angeles Department of City Planning, Citywide General Plan Framework Element, Chapter 9: Infrastructure and Public Services – Wastewater, originally adopted by City Council on December 11, 1996 and re-adopted on August 8, 2001.

The Final IRP 5-Year Review was released in June 2012, which included 12 projects that were separated into two categories: (1) “Go Projects” for immediate implementation and (2) “Go-If Triggered Projects” for implementation in the future once a trigger is reached.²⁸ Triggers for these projects include wastewater flow, population, regulations, or operational efficiency. Based on the Final IRP 5-Year Review, the Go Projects consisted of six capital improvement projects for which triggers were considered to have been met at the time the IRP EIR was certified. The Go-If Triggered Projects consisted of six capital improvement projects for which triggers were not considered to have been met at the time the IRP EIR was certified.

Since the implementation of the IRP, new programs and projects, which have resulted in a substantial decrease in wastewater flows, have affected the Go Projects and Go-If Triggered Projects. Based on the Final IRP 5-Year Review, two of the Go Projects have been moved to the Go-If Triggered category (Go Project 2 and Go Project 3), and two have been deferred beyond the 2020 planning window of the IRP (Go Project 4 and Go Project 5). Construction of wastewater storage facilities at the Donald C. Tillman Water Reclamation Plant (Go Project 1) has been completed. In addition, Go Project 6, involving the design of the North East Interceptor Sewer Phase II, is no longer being pursued.²⁹

(3) One Water LA 2040 Plan

In April 2018, the City prepared the One Water LA Plan, an integrated approach to Citywide recycled water supply, wastewater treatment, and stormwater management.³⁰ The new plan builds upon the City's Water IRP, which projected needs and set forth improvements and upgrades to wastewater conveyance systems, recycled water systems, and runoff management programs through the year 2020, and extends its planning horizon to 2040. The One Water LA Plan proposes a collaborative approach to managing the City's future water, wastewater treatment, and stormwater needs with the goal of yielding sustainable, long-term water supplies for Los Angeles to ensure greater resilience to drought conditions and climate change. The One Water LA Plan is also intended as a step toward meeting the Mayor's Executive Directive to reduce the City's purchase of imported water by 50 percent by 2024.³¹ Major challenges addressed in the One Water LA Plan include recurring drought, climate change, and the availability of recycled water in the future in light of declining wastewater volumes.

²⁸ City of Los Angeles Department of Public Works Bureau of Sanitation and Department of Water and Power, Water Integrated Resources Plan 5-Year Review FINAL Documents, June 2012.

²⁹ City of Los Angeles Department of Public Works, Bureau of Engineering, Project Information Report, North East Interceptor Sewer (NEIS) Phase 2A.

³⁰ City of Los Angeles, One Water LA 2040 Plan, Volume 1, Summary Report, April 2018.

³¹ City of Los Angeles, Office of the Mayor, Executive Directive No. 5, Emergency Drought Response - Creating a Water Wise City, October 14, 2014.

(4) Los Angeles Municipal Code

(a) *Los Angeles Green Building Code*

The City has been pursuing a number of green development initiatives intended to promote energy conservation and reductions in the amount of greenhouse gas emissions generated within the City. While these ordinances do not focus on the provision of sewer services, they do mandate the use of water conservation features in new developments. Examples of such water conservation features include, but are not limited to, low water shower heads, toilets, clothes washers and dishwashers. Because the flow through these fixtures is reduced, residual wastewater passing through is reduced, in turn reducing the demand for sewage conveyance and treatment.

LAMC Chapter IX, Article 9, the Los Angeles Green Building Code (LA Green Building Code, Ordinance No. 181,480),³² was adopted in April 2008 and provides standards and a mechanism for evaluating projects for their water conservation features during site plan review. The LA Green Building Code has been subsequently amended to incorporate various provisions of the CALGreen Code. The LA Green Building Code includes mandatory requirements and elective measures pertaining to wastewater for three categories of buildings, the non-residential and high-rise residential buildings.

(b) *Water Efficiency Requirements Ordinance*

LAMC Chapter XII, Article 5, the Water Efficiency Requirements Ordinance (Ordinance No. 180,822),³³ effective December 1, 2009, requires the installation of efficient water fixtures, appliances, and cooling towers in new buildings and renovation of plumbing in existing buildings, to minimize the effect of water shortages for City customers and enhance water supply sustainability.

(c) *Sewer Capacity Availability Review*

The LAMC includes regulations that require the City to assure available sewer capacity for new projects and to collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when an applicant seeks a sewer permit to connect a property to the City's sewer system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR provides a preliminary assessment of the capacity of the existing municipal sewer system to safely convey a project's newly generated wastewater to the appropriate sewage treatment plant.

(d) *Sewerage Facilities Charge*

LAMC Sections 64.11 and 64.12 require approval of a sewer permit, also called an "S" Permit, prior to connection to the wastewater system. LAMC Sections 64.11.2 and 64.16.1 require the payment of fees for new connections to the City's sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the

³² City of Los Angeles, Ordinance No. 181480.

³³ City of Los Angeles, Ordinance No. 180822.

Sewerage Facilities Charge is based upon wastewater flow strength, as well as volume. The determination of wastewater flow strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use. Sewerage Facilities Charge fees are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including, but not limited to, industrial waste control and water reclamation purposes.

(e) Bureau of Engineering Special Order

The City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City standards (Bureau of Engineering Special Order No. SO 06-0691). Per the Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period does not exceed one-half of the pipe diameter (D) (i.e., depth-to-diameter ratio or d/D).³⁴

3. ENVIRONMENTAL SETTING

The Project Site is bounded by Romaine Street to the north, a maintenance yard to the east, Barton Avenue to the south, and N. Las Palmas Avenue to the west.

3.1. WATER

LADWP is responsible for providing water supply to the City while complying with County, State, and Federal regulations.

3.1.1. REGIONAL

Primary sources of water for the LADWP service area are the Los Angeles Aqueduct (LAA), State Water Project (supplied by MWD) and local groundwater. The LAA has been the primary source of the City's water supply. In recent years, however, the amount of water supplies from the LAA has been limited due to environmental concerns, and the City's water supply relied heavily (average of 57% in recent years) on the purchased water from MWD delivered from the Colorado River or from the Sacramento-San Joaquin Delta. Local ground water has been a reliable water source, providing an average of 12% of the total water supply, but there have been concerns in recent years due to declining groundwater level and contamination issues. Lastly, the City's recycled water

³⁴ City of Los Angeles Department of Public Works, Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.

supply is limited to specific projects within the City at this time.³⁵

3.1.2. LOCAL

LADWP maintains water infrastructure to the Project Site. Based on available record data provided by LADWP, there is a 8-inch water main in Romaine Street and an 8-inch water main in Las Palmas Avenue. Based on existing record information the Project Site has multiple domestic water and fire water connections coming off of one adjacent street. The following is a detailed account of the existing water infrastructure serving the project site (Please see Exhibit 3 for their approximate location and details):

- Romaine Street
 - 2 Fire Hydrant (FH ID: 35504 and 35505)
- Barton Avenue
 - 2 Fire Hydrants (FH ID: 35503 and 35502)

Water consumption estimates have been prepared based on 100% of the City of Los Angeles Bureau of Sanitation (BOS) sewage generation factors for commercial categories and are summarized in the Table below. We have assumed that the sewage generated from the site equals the water demand for the site.

Table 1 – Existing Water Demand			
Land Use	Quantity	Water Demand	
		(gpd)^a	(afy)
Office Space	25,367	3,076	3.5
Total Existing Water Demand		3,076	3.5
^a City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation rates of 120GPD/1000 GRSF for Office Buildings was used			

The existing 8” water main in Romaine Street and 8” water main in Las Palmas Avenue that service the existing development have an existing capacity of 1,500 gpd at 97 psi from Hydrant F-35504 located on the NE corner of Romaine St and Las Palmas Ave per the Information on Fire Flow Availability (IFFAR).

The proposed development would increase the domestic water and fire water demand from the Project Site. An IFFAR (Exhibit 3) was obtained for the Project, to determine if existing infrastructure has the capacity to accept the proposed flows of the new development. The existing infrastructure has the capacity to deliver 6,000 gpm at 20 psi

³⁵ LADWP, 2020 Urban Water Management Plan, <https://www.ladwp.com/who-we-are/water-system/sources-supply/urban-water-management-plan> accessed March 26, 2024.

per Exhibit 2.

An approved IFFAR signifies that the existing infrastructure has the capability and capacity to service the proposed buildings.

3.2. WASTEWATER

3.2.1. REGIONAL

BOS operates and maintains the wastewater treatment, reclamation and collection facilities serving most of the City of Los Angeles incorporated areas as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. The collection infrastructure consists of over 6,700 miles of local, trunk, mainline and major interceptor sewers, five major outfall sewers, and 46 pumping plants. The wastewater generated by the Project ultimately flows to the Hyperion Water Reclamation Plant (HWRP) System. The existing design capacity of the Hyperion Service Area is approximately 450 million gallons per day (mgd) and the existing average daily flow for the system is approximately 300 mgd.³⁶ However, the LA Sanitation's Customer Care Center Facts & Figures for Wastewater Collection and Treatment dated 01/25/2020 indicates the existing average daily flow for the system is approximately 350 mgd. As such, the more conservative value of 350 mgd has been used in the analysis.

3.2.2. LOCAL

Sanitary sewer is provided by the City's BOS. It appears that there are multiple existing sewer laterals serving the existing buildings. Please see Exhibit 4 for existing sewer lines and their size, direction of flow and slope.

There is an existing 6-inch concrete sewer line in Las Palmas Avenue, 8-inch Vitrified Clay Pipe (VCP) sewer line in Santa Monica Boulevard, and a 12-inch VCP sewer line in Romaine Street. Based on LA Bureau of Engineering's online Navigate LA database, the above-mentioned sewer lines along Cahuenga Boulevard and Hollywood Boulevard have capacities of 0.74 cubic feet per second (cfs) (478,274 gpd), 0.71 cfs (458,885 gpd), and 1.48 cfs (956,549 gpd), respectively.³⁷

The City sewer network ultimately conveys wastewater to the HWRP.

Wastewater generation estimates have been prepared for the existing on-site uses based on the City's BOS sewerage generation factors for commercial categories and are summarized in Table 2 below.

³⁶ City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 2020.

Table 2 – Existing Wastewater Generation			
Land Use	Size	Generation Rate (gpd) ^a	Wastewater Generation (gpd)
Office Space	25,637	120 KGSF	3,076
Total Existing Wastewater Generation			3,076
Notes:			
^a City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation rates.			

4. SIGNIFICANCE THRESHOLDS

4.1. WATER

In accordance with State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to water supply and infrastructure if it would:

- Require or result in the relocation or construction of new or expanded water facilities, the construction of relocation of which could cause significant environmental effects; or
- Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate water supply and infrastructure impacts:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of project completion; and
- The degree to which scheduled water infrastructure or project design features

would reduce or offset service impacts.

4.2. WASTEWATER

In accordance with Appendix G, the Project would have a significant impact related to wastewater if it would:

- Require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects; or
- Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The Thresholds Guide identifies the following criteria to evaluate wastewater:

- The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

5. METHODOLOGY

5.1. WATER

The methodology for determining the significance of a project as it relates to a project's impact on water supply and distribution infrastructure is based on the *L.A. CEQA Thresholds Guide*. This methodology involves a review of the project's environmental setting, project impacts, cumulative impacts, and mitigation measures (if required). The following has been considered as part of the determination for this Project:

Environmental Setting

- Description of major water infrastructure serving the Project site, including the type of facilities, location and sizes, and any planned improvements.

- Description of the water conditions for the Project area and known improvement plans.

Project Impacts

- Evaluate the Project's water demand, taking into account design or operational features that would reduce or offset water demand.
- Determine what improvements would be needed, if any, to adequately serve the Project.
- Describe the degree to which presently scheduled off-site improvements offset impacts.
- Describe any water conservation measures included in the proposed Project particularly those that are beyond requirements of present regulations and factor their impact on water use into the Project demand, to the extent possible.

This report analyzes the potential impacts of the Project on the existing public water infrastructure by comparing the estimated Project demand with the calculated available capacity of the existing facilities.

The existing and proposed water demand is based upon available site and occupancy information and 100% of the BOS sewerage generation factors.

LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. LADWP's approach consists of analyzing their water system model near the Project Site. Based on the results, LADWP determines whether they can meet the project fire hydrant flow needs based on existing infrastructure. See Exhibit 2 for the results of the IFFAR. In addition, LADWP performed a flow test to determine if available water conveyance exists for future development. LADWP's approach consists of data ranging from available static pressure (meaning how much pressure is available at the source before applying the project's demand), to the available pressure at the maximum demand needed for the project. Based on the results, LADWP determines whether they can meet the project needs based on existing infrastructure.

Project water demand estimates incorporate proposed water conservation measures identified later in this report under Section 6: Project Characteristics.

5.2. WASTEWATER

The methodology for determining the significance of a project as it relates to a project's impact on wastewater collection and treatment infrastructure is based on the *L.A. CEQA Thresholds Guide*. This methodology involves a review of the project's environmental setting, project impacts, cumulative impacts, and mitigation measures (if required). The

following has been considered as part of the determination for this Project:

Environmental Setting

- Location of the Project and appropriate points of connection to the wastewater collection system on the pertinent Wye Map;
- Description of the existing wastewater system which would serve the Project, including its capacity and current flows.
- Summary of adopted wastewater-related plans and policies that are relevant to the Project area.

Project Impacts

- Evaluate the Project wastewater needs (anticipated daily average wastewater flow), taking into account design or operational features that would reduce or offset service impacts;
- Compare the Project's wastewater needs to the appropriate sewer's capacity and/or the wastewater flows anticipated in the Wastewater Facilities Plan or General Plan.

This report analyzes the potential impacts of the Project on the existing public sewer infrastructure by comparing the estimated Project wastewater generation with the calculated available capacity of the existing facilities.

Pursuant to LAMC Section 64.15, BOS Wastewater Engineering Division made a preliminary analysis of the local and regional sewer conditions to determine if available wastewater conveyance and treatment capacity exists for future development of the Project Site. BOS's approach consisted of the study of a worst-case scenario which envisions peak demands from the relevant facilities occurring simultaneously on the wastewater system. A combination of flow gauging data and computed results from the City's hydrodynamic model were used to project current and future impacts due to additional sewer discharge. The data used in this report are based on the findings of the BOS preliminary analysis. Refer to Exhibit 3 for the Request for Wastewater Services Information (WWSI) prepared for the Project, which contains the results of the BOS preliminary analysis.

6. PROJECT CHARACTERISTICS

6.1. WATER

The proposed development is anticipated to be serviced by the existing water main in Romaine Street and Las Palmas Avenue. New domestic water laterals are expected to be required to service the proposed building. Water laterals are proposed to connect to the existing 8" main in Romaine Street and 8" main in Las Palmas Avenue. As shown in the IFFAR, the existing public water mains have enough capacity to serve the project.

Furthermore, the project is expected to reduce outdoor potable water use by a minimum of 20 percent compared to baseline water consumption pursuant to the City of Los Angeles No 184248, 2022 California Plumbing Code, 2022 CALGreen Code, 2019 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code. In addition to Title 24 requirements, such as water conserving water closets, urinals and showerheads, reductions in water consumption would be achieved through:

- High Efficiency Toilets with flush volume of 1.0 gallons per flush or less;
- ENERGY STAR Certified Residential Clothes Washers – Front-loading with an Integrated Water Factor of 3.6 or less and capacity of 4.3 cubic feet (cu ft);
- Showerheads with a flow rate of 1.5 gpm or less;
- Domestic Water Heating System located close in proximity to point(s) of use;
- Individual Metering and billing for water use for commercial space;
- Drip/Subsurface Irrigation (Micro-Irrigation);
- Proper Hydro-zoning/Zoned Irrigation (group plants with similar water requirements together); and
- Drought Tolerant Plants – 70 percent of total landscaping.

6.2. WASTEWATER

The proposed development is anticipated to require at least one new lateral connecting to the public sewer mains in Las Palmas Avenue, Barton Avenue, and Romaine Street, to serve the proposed buildings. The sanitary sewer connection for the proposed is expected to connect to the existing 6-inch sewer main along Las Palmas Avenue that flows toward a 12-inch sewer main along Romaine Street with a capacity of 1.48 cfs (956,549 gpd). Refer to Exhibit 4 for a diagrammatical representation of proposed and existing sewer lateral locations.³⁸

7. PROJECT IMPACTS

7.1. CONSTRUCTION

7.1.1. WATER

Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd. Construction water use would be substantially less than the existing water consumption at the Project Site (estimated to be approximately 2,860 gpd). Given the existing water infrastructure meets the current demand at the Project Site, it is anticipated that the existing water infrastructure would meet the limited and

³⁸ Navigate LA <http://navigatela.lacity.org/navigatela/> accessed March 26, 2024.

temporary water demand associated with construction of the Project. Impacts on the water infrastructure due to construction activity would therefore be less than significant.

The Project will require construction of new, on-site water distribution lines and lateral connections to the public mains to serve the new buildings and facilities of the proposed Project. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in the public right of way in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.

Overall, when considering impacts resulting from the installation of any required water infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. No permanent impacts are expected. In fact, improved infrastructure and water supply capacity would be considered a long-term benefit. Such construction would be nominal, its implementation would be limited to aforementioned trenching, and would not affect the Project area after construction is completed. The construction of the Project would not require or result in the construction of new water facilities, or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, the Project impacts on water and water infrastructure associated with construction activities would be less than significant.

Additionally, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Traffic Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase.

7.1.2. WASTEWATER

Construction activities for the Project would not result in wastewater generation as construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. The existing uses would not be operating during construction since the Project involves demolition of all existing buildings. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows. Therefore, Project impacts associated with construction-period wastewater generation would be less than significant.

The Project will require construction of new on-site infrastructure to serve the new buildings. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for connections to public infrastructure. Installation of wastewater infrastructure will be limited to on-site wastewater distribution, and minor off-site work associated with lateral connections to the public main. Off-site work would

require trenching within the existing right-of-way. No upgrades to the public main are anticipated.

Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. No permanent impacts are expected. A Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Traffic Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, Project impacts on wastewater associated with construction activities would be less than significant.

The construction of the Project would not require or result in the construction of new wastewater treatment facilities, or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, the Project impacts on wastewater infrastructure associated with construction activities would be less than significant.

7.2. OPERATION

7.2.1. WATER

7.2.1.1. INFRASTRUCTURE CAPACITY

When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Nevertheless, conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project. See Exhibit 2 for the results of the IFFAR which demonstrate that adequate water infrastructure capacity exists.

7.2.1.2. FIRE WATER DEMAND

Based on fire flow standards set forth in Section 57.507.3 of the LAMC, the Project falls within the industrial and commercial category, which has a required fire flow of 6,000 to 9,000 gpm from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 psi. This translates to a required flow of 1,500 gpm for each hydrant. An IFFAR was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. The completed IFFAR, attached as Exhibit 2, shows four nearby hydrants flowing simultaneously for a combined 6,000 gpm with a residual pressure of 97-99 psi. Thus, as shown by the IFFAR, the Project Site has adequate fire flow available to

demonstrate compliance with Section 57.507.3 of the LAMC under the Project.

Furthermore, LAMC Section 57.513, Supplemental Fire Protection, states that:

Where the Chief determines that any or all of the supplemental fire protection equipment or systems described in this section may be substituted in lieu of the requirements of this chapter with respect to any facility, structure, group of structures or premises, the person owning or having control thereof shall either conform to the requirements of this chapter or shall install such supplemental equipment or systems. Where the Chief determines that any or all of such equipment or systems is necessary in addition to the requirements of this chapter as to any facility, structure, group of structures or premises, the owner thereof shall install such required equipment or systems.

The Project will incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which will be subject to LAFD review and approval during the design and permitting of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. As noted, a IFFAR was submitted to LADWP to determine if the existing public water infrastructure could meet the demands of the Project. The approved IFFAR, attached as Exhibit 1, shows a static pressure of 130-133 pounds per square inch and that a flow of up to 1,500 gpm can be delivered to the Project Site with a residual pressure of 97-99 pounds per square inch, which exceeds the 20 pounds per square inch requirement for the surrounding public hydrants. As shown by the IFFAR, and through compliance with LAFD and LADWP requirements, the Project's fire flow impacts to water infrastructure would be less than significant.

7.2.1.3. DOMESTIC WATER DEMAND

Water consumption estimates have been prepared based 100 percent of the City of LA BOS sewerage generation factors for commercial categories and are summarized in Table 5 below. The approved IFFAR indicates that 1,500 gpm (2,594,051 gpd) is available from the existing 6" water main in Barton Avenue and 1,500 gpm (2,594,051 gpd) is available from the existing 8" water main in Las Palmas Avenue. Also, the calculation summarized in Table 5 below shows the total water demand for the new development as 6,489 gpd (7.27 afy). Therefore, IFFAR result confirms that sufficient infrastructure capacity is available for the Project. The Project proposes to connect to the existing 6-inch main in Barton Avenue and 8-inch main in Las Palmas Avenue with laterals that will be adequately sized to simultaneously accommodate fire demand and domestic demand. In addition, the services will include backflows and be metered separately per City requirements. Therefore, the Project's impacts on water supply would be less than significant.

Table 5 – Project Water Demand			
Type of Use	Size	Generation Factor (gpd) ^(a)	Average Daily Flow (gpd)
Commercial			
Studio Production	69,883 SF	50 KGSF	3,494
Studio: Film/TV	59,900 SF	50 KGSF	2,995
Proposed Subtotal			6,489
Less Existing to be Removed Total ^(c)			3,076
Net Water Demand Upon Project Buildout			3,413
^(a) Proposed generation rates are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at https://engpermitmanual.lacity.org/sites/default/files/documents/Sewage%20Generation%20Factors%20Chart.pdf .			

7.2.2. WASTEWATER

7.2.2.1. SEWER GENERATION

The Project will generate approximately 6,489 gross gpd of wastewater (a net increase of 3,629 gpd over existing wastewater generation at the Project Site). Wastewater generation estimates have been prepared based on the existing and proposed wastewater demand.

Table 6 – Project Waste Water Demand			
Type of Use	Size	Generation Factor (gpd) ^(a)	Average Daily Flow (gpd)
Production Support/Mill Building:			
Studio Production	69,883 SF	50 KGSF	3,494
Four Sound Stages			
Studio: Film/TV	59,900 SF	50 KGSF	2,995
Proposed Subtotal			6,489
Less Existing to be Removed Total ^(c)			3,076
Net Additional Wastewater Generation			3,413
^(a) Proposed generation rates are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at https://engpermitmanual.lacity.org/sites/default/files/documents/Sewage%20Generation%20Factors%20Chart.pdf .			

The sewer infrastructure in the vicinity of the project includes an existing 6-inch concrete sewer line in Las Palmas Avenue, 8-inch VCP sewer line in Barton Avenue, and a 12-inch VCP sewer line in Romaine Street with a capacity of 1.48 cfs (956,549 gpd). The proposed development is anticipated to require at least one new lateral in Las Palmas Avenue, Barton Avenue, or Romaine Street, to serve the proposed buildings. Based on the estimated flows, shown in Table 6 above, it appears the sewer system should be able to accommodate the total flow for the proposed development.

With respect to wastewater treatment capacity, as indicated previously, the existing design capacity of the Hyperion Service Area is approximately 450 million gallons per day, while the existing average daily flow treated by the System is approximately 350 mgd.³⁹ The Project's estimated net increase in wastewater generation of approximately 0.003629 mgd would be far less than one percent of the HWRP's remaining available capacity. Consequently, adequate wastewater treatment capacity exists to serve the Project, and Project impacts on wastewater treatment capacity would be less than significant.

7.3. CUMULATIVE IMPACTS

7.3.1. WATER

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City). LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The 2020 UWMP prepared by LADWP accounts for existing development within the City, as well as projected growth through the year 2045.

Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. The types of projects that are subject to the requirements of SB 610 tend to be larger projects that may or may not have been included within the growth projections of the 2020 UWMP. The water supply assessment for projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed.

Furthermore, through LADWP's 2020 UWMP process and the City's Securing L.A.'s Water Supply, the City will meet all new demand for water due to projected population growth to the year of 2045, through a combination of water conservation and water

³⁹ City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=oe81wkld_4&_afLoop=28344654751341747#!, accessed March 26, 2024

recycling. These plans outline the creation of sustainable sources of water for the City of Los Angeles to reduce dependence on imported supplies. LADWP is planning to achieve these goals by expanding its water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge.

There are 18 related projects, which consist of, but are not limited to, residential, restaurants, office, restaurants, commercial space, fitness, hotel, studio: film/tv, and retail. The total increase in water demand for the related projects is approximately 0.205 million gallons per day (MGD). Combined with the Project, the increase in water demand is approximately .208 MGD. Refer to Exhibit 5 for a breakdown of the related projects and associated water consumption. The 2020 UWMP has estimated a water demand of 475 mgd by the year 2025, which means the Project combined with the related projects would account for approximately 0.04 percent of the total daily demand.

Based on the above, it is anticipated that LADWP would be able to supply the water demands of the Project as well as support future growth. Therefore, cumulative impacts on water supply would be less than significant.

7.3.2 WASTEWATER

The Proposed Project will result in the additional generation of sewer flow. However, as discussed above, the BOS will conduct an analysis of existing and planned capacity and will determine that adequate capacity exists to serve the Project. Related projects connecting to the same sewer system are required to obtain a sewer connection permit and submit a WWSI to the Bureau of Sanitation as part of the related project's development review. Impact determination will be provided following the completion of the WWSI analysis. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and the Bureau of Sanitation to construct the necessary improvements. At this time, the City's BOS has found that it has the capacity to serve the Project and related projects anticipated in growth forecast with the existing infrastructure. In addition, the City's BOS analysis confirms that the HWRP has sufficient capacity and regulatory allotment for the Project and anticipated growth of cumulative projects. Therefore, operation of the Project would have a less than significant impact on wastewater treatment facilities.

8. LEVEL OF SIGNIFICANCE

Based on the analysis contained in this report no significant impacts have been identified for water or wastewater for this Project.

EXHIBITS

EXHIBIT 1 – WASTEWATER SERVICES INFORMATION

EXHIBIT 2 - LADWP “Information of Fire Flow Availability Request” (IFFAR) Results
Waiting For Approval

EXHIBIT 3 - Existing Water & Wastewater infrastructure exhibit

EXHIBIT 4 - Proposed Water & Wastewater infrastructure exhibit

EXHIBIT 5 – Related Projects List

BOARD OF PUBLIC WORKS
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HYPERION EXECUTIVE PLANT MANAGER—
WASTEWATER ENGINEERING
SERVICES DIVISION
2714 MEDIA CENTER DRIVE
LOS ANGELES, CA 90065
FAX: (323) 342-6210
WWW.LACITYSAN.ORG

December 21, 2023

Mr. Chris Chin, Project Manager
 KPFF Consulting Engineers
 700 S Flower Street, #2100
 Los Angeles, CA 90017

Dear Mr. Chin,

SUNSET LAS PALMAS LOWER LOT PLAN - REQUEST FOR WASTEWATER SERVICES INFORMATION

This is in response to your December 15, 2023 letter requesting a review of your proposed project located at 6650 Romaine Street, Los Angeles, CA 90038. The project will consist of a new studio production with one new four-story building and four sound stages. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative capacity impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<i>Proposed</i>			
Studio: Film/TV	50 GPD/1000 SQ.FT	59,900 SQ.FT	2,995

zero waste • zero wasted water**AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER**

File Location: CEQA Review\FINAL CEQA Response LTRs\FINAL DRAFT\Sunset Las Palmas Lower Lot Plan - Request for WWSI.docx

Studio Production	50 GPD/1000 SQ.FT	69,883 SQ.FT	3,494
Total			6,489 GPD

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 12-inch line on Romaine St. The sewage from the existing 12-inch line feeds into a 45-inch line on Willoughby Ave before discharging into a 45-inch sewer line on Detroit St. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 12-inch line cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
12	Romaine St.	*	478,089 GPD
12	Seward St.	48	1.22 MGD
45	Willoughby Ave.	*	24.88 MGD
45	Detroit St.	23	31.0 MGD

* No gauging available

Based on estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at the time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

All sanitary wastewater ejectors and fire tank overflow ejectors shall be designed, operated, and maintained as separate systems. All sanitary wastewater ejectors with ejection rates greater than 30 GPM shall be reviewed and must be approved by LASAN WESD staff prior to other City plan check approvals. Lateral connection of development shall adhere to Bureau of Engineering Sewer Design Manual Section F 480.

This response letter is not intended to address any potential utility conflicts associated with the wastewater or stormwater conveyance systems. Construction of any type near any wastewater or stormwater conveyance infrastructure in the public right of way, or in/near any conveyance easement must be evaluated separately.

If you have any questions, please call Than Win at (323) 342-6268 or email at than.win@lacity.org.

STORMWATER REQUIREMENTS

LA Sanitation, Stormwater Program is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter VI, Article 4.4, of the Los Angeles Municipal Code), the Project shall comply with all mandatory provisions to the Stormwater Pollution Control Measures for Development Planning (also known as Low Impact Development [LID] Ordinance). Prior to issuance of grading or building permits, the applicant shall submit a LID Plan to the City of Los Angeles, Public Works, LA Sanitation, Stormwater Program for review and approval. The LID Plan shall be prepared consistent with the requirements of the Planning and Land Development Handbook for Low Impact Development.

Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lacitysan.org. It is advised that input regarding LID requirements be received in the preliminary design phases of the project from plan-checking staff. Additional information regarding LID requirements can be found at: www.lacitysan.org or by visiting the stormwater public counter at 201 N. Figueroa, 2nd Fl, Suite 280.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local groundwater basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. Green Street standard plans can be found at: <https://eng2.lacity.org/techdocs/stdplans/index.htm>

CONSTRUCTION REQUIREMENTS

All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15. Construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

If there are questions regarding the stormwater requirements, please call WPP's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 2nd Fl, Suite 280.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate

Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

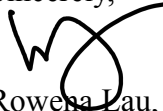
To help offset costs of water conservation and reuse systems, LADWP offers a Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of \$1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from the Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact LA Sanitation Solid Resources Recycling hotline 213-922-8300.

Sincerely,



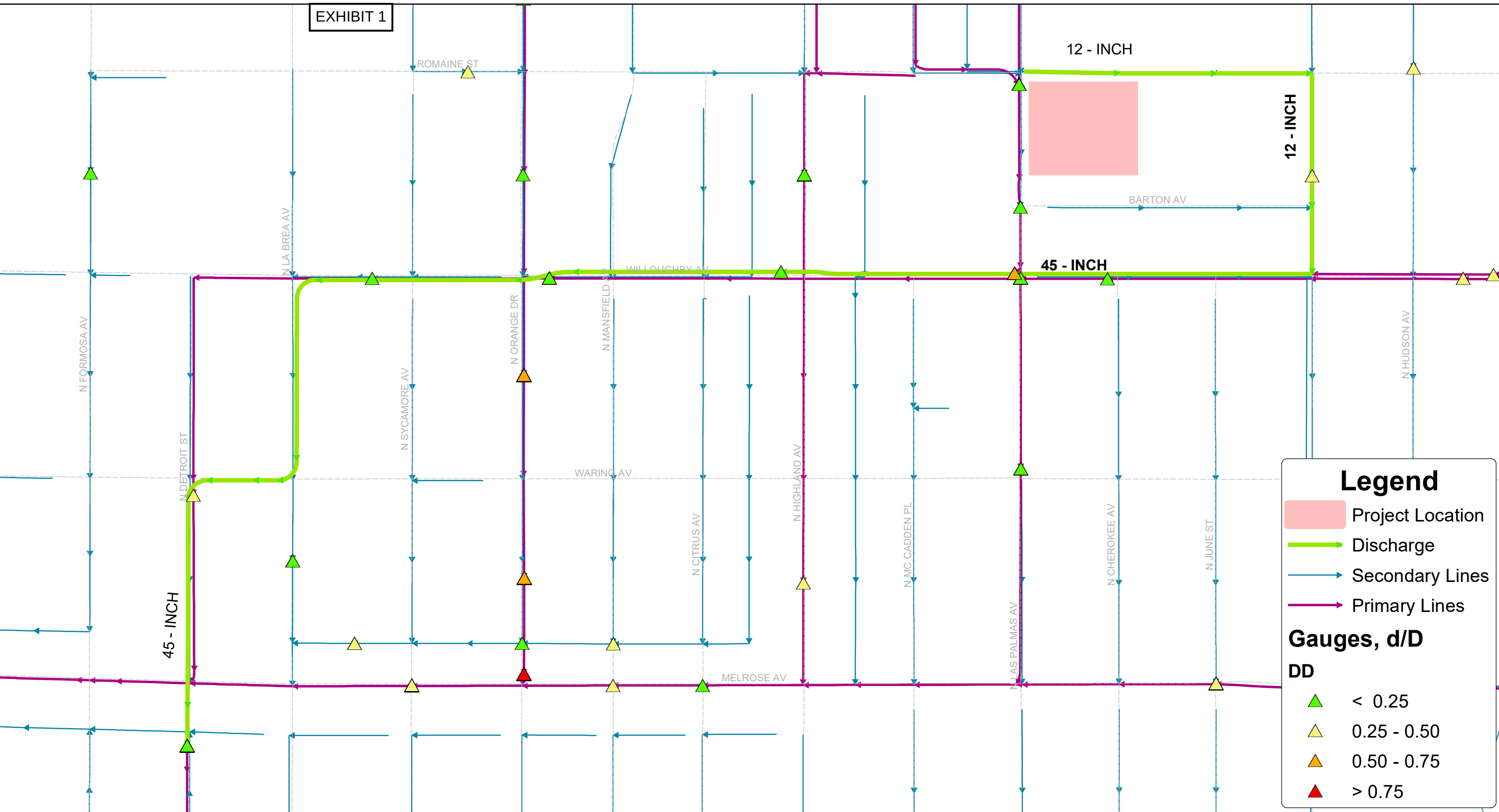
Rowena Lau, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

RL/TW: sa

Attachment: Figure 1 - Sewer Map

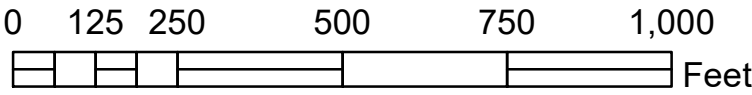
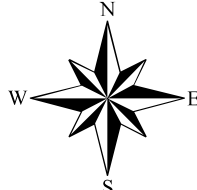
c: Julie Allen, LASAN
Michael Scaduto, LASAN
Spencer Yu, LASAN
Than Win, LASAN

EXHIBIT 1



Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Figure 1
Sunset Las Palmas Lower Lot Plan
Sewer Map



Thomas Brother Data reproduced with permission granted by THOMAS BROS MAP



City of Los Angeles

Los Angeles Department of Water and Power - Water System

1 of 2

INFORMATION OF FIRE FLOW AVAILABILITY

6,000 TO 9,000 GPM FROM
4 TO 6 FIRE HYDRANTS FLOWING

Water Service Map No.: W144-186

LAFD Fire Flow Requirement: SIMUTANEOUSLY LAFD Signature: _____
Date Signed: _____

Applicant: CHRIS CHIN

Company Name: KPFF CONSULTING ENGINEERS

Address: 700 SOUTH FLOWER SUITE 2100

Telephone: _____

Email Address: CHRIS.CHIN@KPFF.COM

	F- <u>35504</u>	F- <u>35505</u>	F- <u>35502</u>
Location:	<i>NE corner Romaine St & Las Palmas Ave</i>	<i>N side Romaine St, 449' WW Seward St</i>	<i>SE corner Barton Ave & Las Palmas Ave</i>
Distance from Nearest Pipe Location (feet):	<i>18 ft</i>	<i>18 ft</i>	<i>15 ft</i>
Hydrant Size:	2.5 x 4D	2.5 x 4D	2.5 x 4D
Water Main Size (in):	8	8	6
Static Pressure (psi):	<i>130 psi max</i>	<i>129 psi max</i>	<i>133 psi max</i>
Residual Pressure (psi):	<i>97 psi</i>	<i>97 psi</i>	<i>99 psi</i>
Flow at 20 psi (gpm):	<i>1500 gpm</i>	<i>1500 gpm</i>	<i>1500 gpm</i>

NOTE: Data obtained from hydraulic analysis using peak hour.

Remarks: _____ **ECMR No.** _____
F-35504, F35505, F35502 & F-35503 at 1500 gpm each simultaneously for 6000 gpm combined.

Water Purveyor: Los Angeles Department of Water & Power Date: 03/06/2024

Signature: _____

Digitally signed by Mark Patterson
Date: 2024.03.06 21:32:33-08'00'

Title: Mark Patterson - Civil Engineering Associate

Requests must be made by submitting this completed application, along with a \$271.00 check payable to:
"Los Angeles Department of Water and Power", and mailed to:

Los Angeles Department of Water and Power
Distribution Engineering Section - Water
Attn: Business Arrangements
111 North Hoe Street - Room 1425
Los Angeles, CA 90012

Cristina Reyes
FEB 07 2024

* If you have any questions, please contact us at (213) 367-2WNB or visit our web site at <http://www.ladwp.com>.

Project Site Address: 6650 Romaine St, Los Angeles, CA 90038
Please run all 4 hydrants simultaneously. See application #2 for additional hydrant



City of Los Angeles

Los Angeles Department of Water and Power - Water System

2 of 2

INFORMATION OF FIRE FLOW AVAILABILITY

6,000 TO 9,000 GPM FROM
4 TO 6 FIRE HYDRANTS FLOWING

Water Service Map No.: W144-186

LAFD Fire Flow Requirement: SIMUTANEOUSLY

LAFD Signature: _____

Date Signed: _____

Applicant: CHRIS CHIN

Company Name: KPFF CONSULTING ENGINEERS

Address: 700 SOUTH FLOWER SUITE 2100

Telephone: _____

Email Address: CHRIS.CHIN@KPFF.COM

	F- 35503	F- _____	F- _____
Location:	<i>S side Barton St, 423' EE Las Palmas Ave</i>		
Distance from Nearest Pipe Location (feet):	<i>13 ft</i>		
Hydrant Size:	<i>2.5 x 4D</i>		
Water Main Size (in):	<i>6</i>		
Static Pressure (psi):	<i>133 psi max</i>		
Residual Pressure (psi):	<i>99 psi</i>		
Flow at 20 psi (gpm):	<i>1500 gpm</i>		

NOTE: Data obtained from hydraulic analysis using peak hour.

Remarks:

ECMR No. _____

F-35504, F35505, F35502 & F-35503 at 1500 gpm each simultaneously for 6000 gpm combined.

Water Purveyor: Los Angeles Department of Water & Power

Date: 03/06/2024

Signature: _____

Digitally signed by Mark Patterson
Date: 2024.03.06 21:32:46-0800

Title: Mark Patterson - Civil Engineering Associate

Requests must be made by submitting this completed application, along with a \$271.00 check payable to:

"Los Angeles Department of Water and Power", and mailed to:

Los Angeles Department of Water and Power

Distribution Engineering Section - Water

Attn: Business Arrangements

111 North Hoe Street - Room 1425

Los Angeles, CA 90012

Cristina Reyes

FEB 07 2024

* If you have any questions, please contact us at (213) 367-2WNB or visit our web site at <http://www.ladwp.com>.

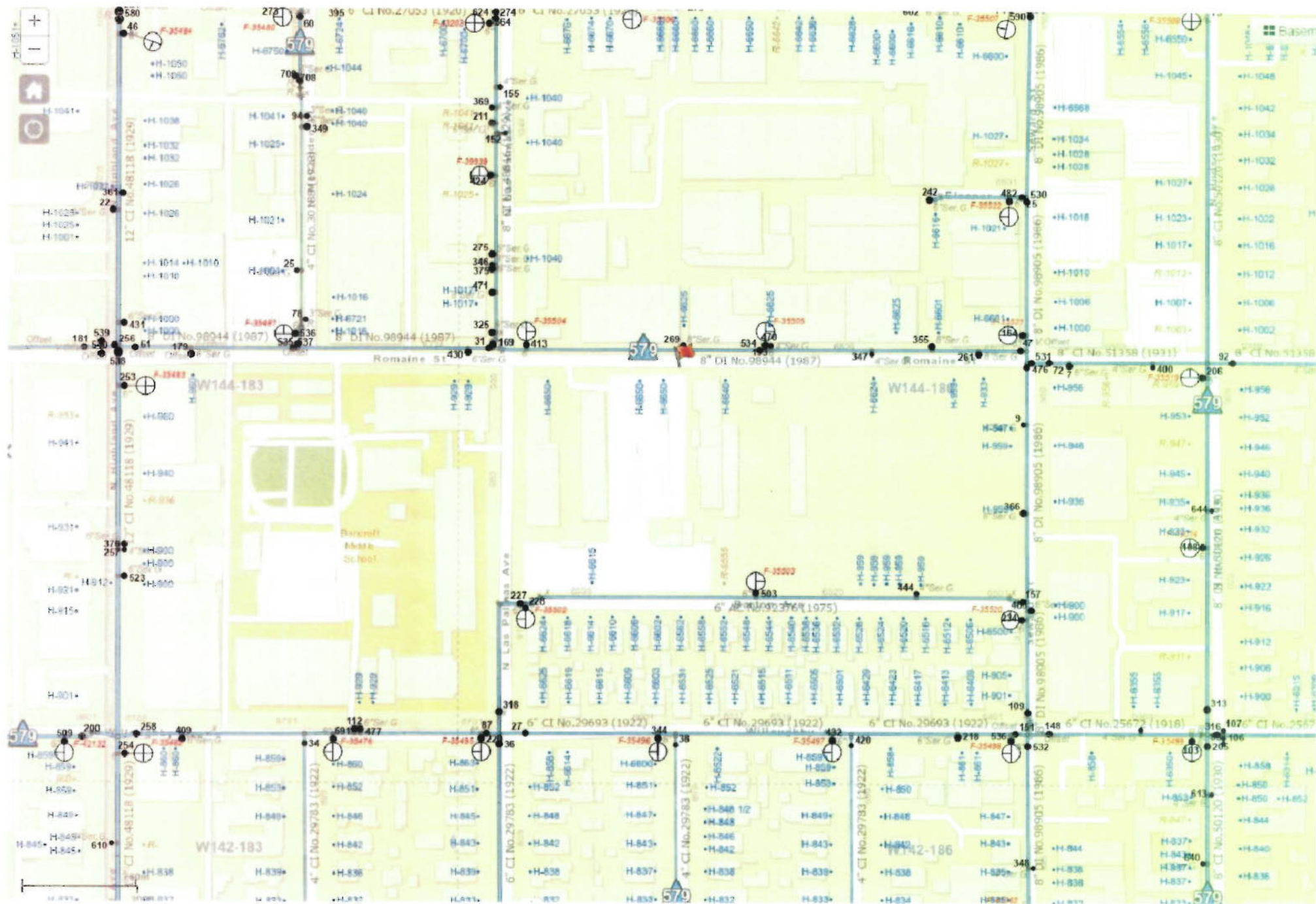


EXHIBIT 3 - EXISTING WATER & WASTEWATER INFRASTRUCTURE EXHIBIT

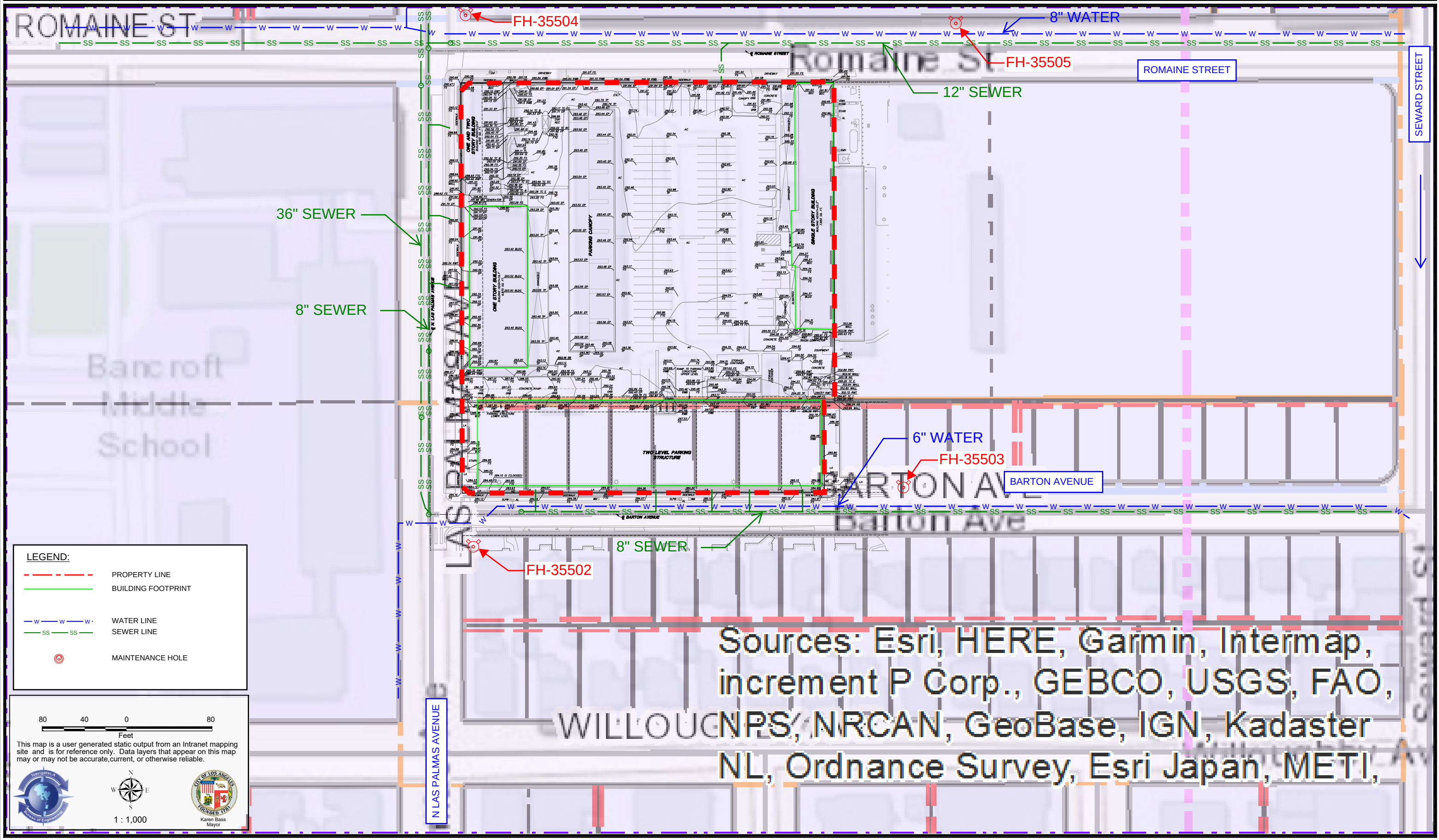


EXHIBIT 4 - PROPOSED WATER & WASTEWATER INFRASTRUCTURE EXHIBIT

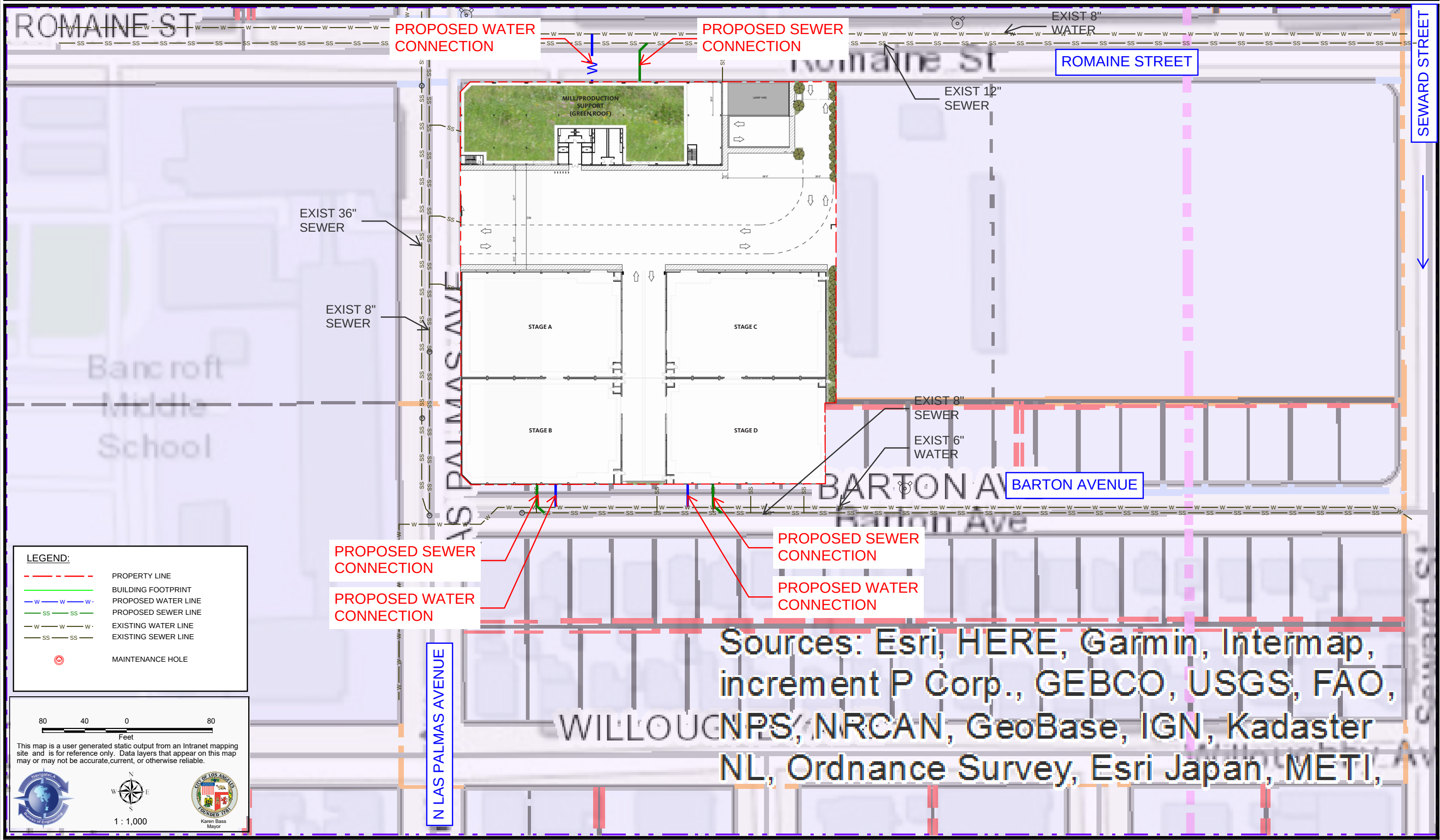


EXHIBIT 5

Related Projects - Estimated Water Consumption Table			
Land Use	Units	Consumption Rate ⁽²⁾ (gpd/unit)	Total Consumption (gpd)
Restaurant	36,088	300/1000 SF	10,826.4
Retail	17,048	50/1000 SF	426.2
Office	1,075,350	120/1000 SF	129,042
Apartment	153	150/DU ⁽¹⁾	22,950
Commercial	206,598	50/1000 SF	10,329.9
Fitness	58,417	200/1000 SF	11,683.4
Hotel	91	120/RM	10,920
Studio: Film/ TV	101,557	50/1000SF	5,077.9
Residential: SFH	18	185/DU ⁽¹⁾	3330
TOTAL			204,585.8
SF= SQUARE FEET, GPD = GALLONS PER DAY, DU= DWELLING UNIT, RM=ROOM			
¹ For calculation purposes all units assumed as 2-Bedroom			
² Consumption rates based on 100% of Bureau of Sanitation Sewer Generation Factors for Residential and Commercial Categories. https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart			